

From: [Hollis](#)
To: [Brian Herrington](#); [Brittaney Thornton](#); [Rogen Chhabra](#)
Cc: [Crystal Vincent](#); [Jonathan Miller](#); [Tim Holleman](#)
Bcc: [Robert Wilkinson](#)
Subject: RE: Divine v. Securix
Date: Tuesday, November 1, 2022 1:03:00 PM

Mr. Herrington,

Under most any other circumstance than currently at-hand, we would certainly be agreeable to such. However, as events have unfolded and a better understanding of this case developed, we have learned time is absolutely of the essence for our client. They are verifiably suffering day-to-day under the dark cloud this lawsuit has created, for no legitimate reason. Every passing day is costing our client exponentially, and for that reason, this must be pushed to its conclusion forthwith.

Best Regards,

Hollis T. Holleman

Boyce Holleman & Associates
Boyce Holleman Blvd.
1720 23rd Ave
Gulfport, Ms
228-863-3142
hollis@boyceholleman.com

CONFIDENTIAL AND/OR PRIVILEGED

The information contained in this email transmission is legally privileged, confidential information exempt from disclosure under applicable law and is intended only for the use of the individual or entity to which it is addressed. If you are neither the intended recipient nor the employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this email transmission is strictly prohibited. If you have received this email transmission in error, please immediately notify us by telephone at (228) 863-3142. Thank you, Hollis T. Holleman, Boyce Holleman & Associates, 1720 23rd Avenue, Boyce Holleman Blvd., Gulfport, Mississippi. 39501

From: Brian Herrington <bherrington@nationalclasslawyers.com>
Sent: Monday, October 31, 2022 5:18 PM
To: Tim Holleman <tim@boyceholleman.com>; Brittaney Thornton <bthornton@nationalclasslawyers.com>; Rogen Chhabra <rchhabra@cglawms.com>
Cc: Crystal Vincent <crystal@boyceholleman.com>; Jonathan Miller <jm@securixsystems.com>; Hollis <hollis@boyceholleman.com>; Tim Holleman <tim@boyceholleman.com>
Subject: RE: Divine v. Securix

Tim,

I just left you a voicemail on your cell phone. Per Rule 15, we're going to file an amended complaint, which is due by Nov. 7. I'm lead counsel in an 11th Circuit appeal that's been

monopolizing my time, so I'm going to move for a 21-day extension of the deadline. Previously, I agreed to Securix having an extra 21 days to respond to the complaint. I hope that you'll return the favor and I can state that Defendant has no objection. Please let me know.

Brian K. Herrington

Chhabra Gibbs & Herrington PLLC

a Mass Tort & Class Action Firm

120 North Congress Street, Suite 200
The Plaza Building
Jackson, MS 39201

T | 601 948 8005 F | 601 948 8010
bherrington@nationalclasslawyers.com
<https://www.nationalclasslawyers.com/>

CONFIDENTIALITY NOTE

THIS EMAIL MESSAGE AND ITS CONTENTS ARE LEGALLY PRIVILEGED AND CONFIDENTIAL AND ARE INTENDED ONLY FOR USE OF THE ADDRESSEE NAMED ABOVE. IF YOU ARE NOT THE NAMED RECIPIENT, YOU ARE NOTIFIED THAT DISTRIBUTION OR COPYING OF THIS EMAIL MESSAGE OR ITS CONTENTS IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS INFORMATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL EMAIL MESSAGE AND ITS CONTENTS TO US BY MAIL AT THE ADDRESS AS INDICATED ABOVE.

-

From: Brian Herrington <bherrington@nationalclasslawyers.com>
Sent: Wednesday, October 26, 2022 4:52 PM
To: Tim Holleman <tim@boyceholleman.com>; Brittaney Thornton <bthornton@nationalclasslawyers.com>; Rogen Chhabra <rchhabra@cglawms.com>
Cc: Crystal Vincent <crystal@boyceholleman.com>; Jonathan Miller <jm@securixsystems.com>; Hollis <hollis@boyceholleman.com>; Tim Holleman <tim@boyceholleman.com>
Subject: Re: Divine v. Securix

Received.

Brian K. Herrington
Chhabra Gibbs & Herrington PLLC
a Mass Tort & Class Action Firm
120 North Congress Street, Suite 200
The Plaza Building
Jackson, MS 39201

T | 601 948 8005 F | 601 948 8010
bherrington@nationalclasslawyers.com

From: Tim Holleman <tim@boyceholleman.com>

Sent: Wednesday, October 26, 2022 10:00:16 AM

To: Brian Herrington <bherrington@nationalclasslawyers.com>; Brittaney Thornton <bthornton@nationalclasslawyers.com>; Rogen Chhabra <rchhabra@cglawms.com>

Cc: Crystal Vincent <crystal@boyceholleman.com>; Jonathan Miller <jm@securixsystems.com>; Hollis <hollis@boyceholleman.com>; Tim Holleman <tim@boyceholleman.com>

Subject: Divine v. Securix

Mr. Herrington,

See the attached which is self explanatory. Please acknowledge receipt of this email and attachment for the purpose of confirming service of the Motion for Sanctions 21 days prior to filing pursuant to Rule 11(c)(2) of the Federal Rules of Civil Procedure.

Tim C. Holleman

Boyce Holleman & Associates

1720 23rd Ave./Boyce Holleman Blvd.

Gulfport, Ms 39501

Office: [228-863-3142](tel:228-863-3142)

Fax: [228-863-9829](tel:228-863-9829)

Cell: [228-297-3142](tel:228-297-3142)

Email: tim@boyceholleman.com